

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GREAT WESTERN INSURANCE COMPANY,

Plaintiffs,

v.

MARK GRAHAM, DONALD SOLOW, BLUE
CAPITAL MANAGEMENT, INC., BLUE
ALTERNATIVE ASSET MANAGEMENT LLC,
WILMINGTON SAVINGS FUND SOCIETY, FSB,
CHRISTIANA TRUST, REGATTA HOLDINGS
LLC, CYGNET 001 MASTER TRUST, CYGNET
001 MASTER TRUST SERIES 2011-A, CYGNET
001 MASTER TRUST SERIES 2011-C, CYGNET
001 MASTER TRUST SERIES 2013-A, ALPHA
RE LIMITED, ALPHA RE HOLDINGS
(CAYMAN) LIMITED, ATLANTIC SPECIALTY
FINANCE, BLUE ELITE FUND LTD., BLUE
ELITE FUND LP, BLUE II LTD., SANCUS
CAPITAL BLUE CREDIT OPPORTUNITIES
FUND LTD., ABILITY INSURANCE COMPANY,
JOHN DRAKE, EDWARD BRENDAN LYNCH,
AND GREGORY TOLARAM,

Defendants.

Civil Action No.: 1:18-cv-06249-VSB

[PROPOSED] SCHEDULING ORDER

IT IS HEREBY ORDERED that:

On or before November 7, 2018, Defendants Mark Graham, Blue Capital Management, Inc., Blue Alternative Asset Management, LLC, Blue Elite Fund, Ltd., Blue Elite Fund, L.P., and Blue II, Ltd. (collectively, “Blue Entities”) shall file any and all pre-answer motions to dismiss;

On or before December 5, 2018, Plaintiffs shall file any opposition, and

On or before December 20, 2018, the Blue Entities shall file replies in further support of the motions.

Dated: September __, 2018

Hon. Vernon S. Broderick, U.S.D.J.